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April 19, 2013

Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

EX PARTE LETTER

RE: GN Docket No. 13-5, GN Dkt. 12-353, WC Dkt. 05-25

Dear Secretary Dortch:

On April 17, 2013, BT met with following members of the FCC's Technology Transitions Policy Task Force: Sean Lev, General Counsel and Task Force Interim Director, Claude Aiken, Attorney, Tejas Narechania, Special Counsel of the Office of General Counsel, Mindel de la Torre, Bureau Chief and Albert Lewis, Special Counsel, Strategic Analysis & Negotiations of the International Bureau, Patrick Halley, Deputy Director of the Office of Legislative Affairs, Steve Wildman, Chief Economist, Jonathan Chambers, Acting Chief of the Office of Strategic Policy, as well as Lisa Gelb, Deputy Bureau Chief, Eric Ralph, Chief Economist, and Julius Knapp, Chief of the Office of Engineering and Technology. Representing BT were Sheba Chacko, Senior Counsel and Head, North American Regulation and Global Telecoms Policy, and Jennifer Taylor Hodges, VP, US Government Affairs.

During this meeting, BT expressed its concerns about AT&T's petition to launch a proceeding regarding the transition of its network from TDM to IP and certain incumbents' filings in support. The concerns BT highlighted were the same ones that BT had flagged in its reply comment filed February 25, 2013 in GN Dkt. 12-353 (attached) and which are summarized in the presentation also attached. BT explained the types of processes that were put in place when BT had considered a transition to an all-IP network and a shutdown of its legacy network in the UK. BT suggested that better processes than a Section 214 notice of discontinuance were necessary for a candid and comprehensive discussion to take place about the impact of a TDM to IP transition on consumers and competition.

In addition, BT flagged its specific concerns about special access -- that existing, unaddressed monopoly power over last and middle mile infrastructure connecting to US enterprise sites is skewing competition in the global managed enterprise services market. BT cautioned against allowing this problem to continue to skew competition in an all-IP

environment. The concerns BT highlighted were the same ones BT has previously highlighted in its filings in WC Dkt. 05-25.

If you have any questions regarding any matters discussed herein please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'SChacko', with a stylized, cursive script.

Sheba Chacko
Head, North American Regulation and Global Telecoms
Policy, BT

cc: Sean Lev
Tejas Narechania
Lisa Gelb
Eric Ralph
Claude Aiken
Al Lewis
Mindel de la Torre
Steve Wildman
Patrick Halley
Jon Chambers
Julius Knapp